



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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May 20, 2022

By ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Paul Brown v. City of New York*
21-CV-4632 (PGG)(SLC)

Dear Magistrate Judge Cave:

I am an Assistant Corporation Counsel assigned to represent Defendant in the above-captioned action. I write to provide the Court with a status update confirming that the parties have completed discovery in this case,¹ and to respectfully request an approximately 45-day extension of Defendant's time to file its motion for summary judgment, from June 1, 2022 until July 15, 2022.

Following the conference on March 2, 2022, Plaintiff produced his responses to Defendant's interrogatories. Plaintiff did not serve any discovery requests upon Defendant. Defendant produced to Plaintiff all documents produced in connection with the related Michael Lee v. City of New York et al. matter, as well as a copy of his medical record and inmate and movement files. The parties completed discovery on May 2, 2022.

Defendant intends to file a motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. Pursuant to Rule 56, Defendant's motion is currently due June 1, 2022. The requested extension would allow me time to complete researching and drafting Defendant's motion and account for previously-scheduled vacation around the Memorial Day and July Fourth holidays. Additionally, the requested extension would allow me sufficient time to

¹ I apologize to the Court for the timing of this status update.

distill the information from the voluminous discovery into declarations that Defendant intends to submit in support of its motion for summary judgment.

Accordingly Defendant respectfully requests that its deadline to serve and file its motion for summary judgment be extended by approximately 45 days, from June 1, 2022 to July 15, 2022. This is Defendant's first such request. As Plaintiff is incarcerated, I have not obtained his consent. The requested extension would not impact any other deadline.

Thank you for your consideration of this request.

Respectfully submitted,

s/
Hannah J. Sarokin
Assistant Corporation Counsel

cc. **by Mail**

Paul Brown
DIN: 21R0239
NYSID: 01566457Z
Orleans Correctional Facility
3531 Gaines Basin Road
Albion, NY 14411

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe

Paul G. Gardephe, U.S.D.J.

Dated: May 25, 2022